

were then submitted to a lending institution. The fraudulent mortgage loan applications contained materially false, fraudulent and misleading information, including false information regarding applicants' residence, employment, income, and assets.

5. CAMACHO and others at SunTrust Mortgage corroborated or caused to be corroborated the false asset and rental information included on the loan applications and URLAs.

6. CAMACHO and others at SunTrust Mortgage corroborated or caused to be corroborated the false employment and income included on loan applications and URLAs.

7. CAMACHO and others at SunTrust Mortgage falsified borrowers' employment information by altering Certified Public Accountant or tax preparer letters.

8. CAMACHO and others at SunTrust Mortgage profited from these fraudulent transactions in numerous ways, including through salary and incentives.

9. From in or about August 2005 through in or about March 2006, CAMACHO acted as a loan officer assistant in a mortgage loan conspiracy for at least three fraudulent property transaction within the Eastern District of Virginia. As a result of the fraudulent transaction, unqualified buyers obtained over \$900,000 in mortgage loan proceeds. During the aforementioned time period, CAMACHO was a member of the conspiracy and did not withdraw from it.

B) Property Located at 4331 Golden Gate Way, Dumfries, Virginia

10. In or around December 2005, CAMACHO assisted in the completion of URLAs for borrower O.C. that contained false and material information.

11. CAMACHO prepared falsified URLAs on or around December 28, 2005. The URLAs included materially false, fraudulent and misleading information, including that O.C.'s income was \$9,500 a month and that O.C. was self-employed for two years. CAMACHO was

aware that the aforementioned information was false and that it was material to the decision to approve the loan.

12. J.S. directed CAMACHO to claim on the loan application that O.C. was self-employed for two years even though CAMACHO and J.S. knew that information was false.

13. In support of the fraudulent loan applications, CAMACHO, with approval of J.S., altered a tax preparer letter showing that a tax preparer had prepared O.C.'s tax returns for two years and certified that O.C. was self-employed. CAMACHO and J.S. were aware that the aforementioned information was false and that it was material to the decision to approve the loan.

14. On or about December 28, 2005, using the fraudulent URLAs, O.C. purchased the property at 4331 Golden Gate Way, Dumfries, Virginia for a purchase price of \$450,000.

15. On or about July 2009, O.C. defaulted on the mortgage. The property was foreclosed, resulting in a loss of approximately \$256,000.

C) Property Located at 4333 Golden Gate Way, Dumfries, Virginia

16. In or around December 2005, CAMACHO assisted in the completion of URLAs for borrower W.O. that contained false and material information.

17. CAMACHO prepared falsified URLAs on or around December 28, 2005. The URLAs included materially false, fraudulent and misleading information, including that W.O. was self-employed for two years. CAMACHO was aware that the aforementioned information was false and that it was material to the decision to approve the loan.

18. CAMACHO prepared falsified URLAs on or around December 11, 2005. The URLAs included materially false, fraudulent and misleading information, including that W.O. received monthly rental income of \$2,500. CAMACHO was aware that the aforementioned

information was false.

19. In support of the fraudulent loan applications, CAMACHO, with the approval of J.S., caused to be submitted a false employment letter, stating that W.O. was employed as a subcontractor for more than two years. CAMACHO and J.S. were aware that the aforementioned information was false and that it was material to the decision to approve the loan.

20. On or about December 10, 2005, CAMACHO, for the purpose of executing the scheme described above, knowingly caused to be transmitted by wire communication in interstate commerce an employment letter sent by facsimile from a contractor located in Maryland to SunTrust Mortgage in Virginia.

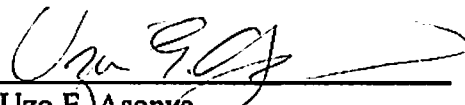
21. In support of the fraudulent loan applications, CAMACHO, with the approval of J.S., altered a tax preparer letter showing that a tax preparer had prepared W.O.'s tax returns for two years and certified that W.O. was self-employed and owned a business for two years. CAMACHO and J.S. were aware that the aforementioned information was false and that it was material to the decision to approve the loan.

22. On or about December 21, 2005, using the fraudulent URLAs, W.O. purchased the property at 4333 Golden Gate Way, Dumfries, Virginia for a purchase price of \$450,000.

23. On or about September 2007, W.O. defaulted on the mortgage. The property was foreclosed, resulting in a loss of approximately \$169,000.

(All in violation of Title 18, United States Code, Section 1349).

Neil H. MacBride
United States Attorney

By: 
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